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and Joshua Lange

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

VENTURA CONTENT, LTD., an
Anguilla corporation;

Plaintiff,

vs.

MOTHERLESS, INC., a New York
corporation; JOSHUA "JOSH"
LANGE, and individual; and DOES 1-
20, inclusive;

Defendants.

Case No. CV 11-05912 SVW (FMOx)

DEFENDANTS' STATUS REPORT

Pursuant to this Court's request, Defendants Motherless, Inc. ("Motherless"),
and Joshua Lange ("Lange"), (collectively "Defendants") submits this status report.

Since the initial Rule 26 scheduling conference before this Court on
November 21, 2011, Defendants and Plaintiff Ventura Content, Ltd. ("Plaintiff"),
(collectively the "Parties"), have engaged in discovery and settlement discussions.

For various reasons, Defendants elected not to file a motion for summary
judgment on their "safe harbor" affirmative defense by the April 2, 2012 deadline
previously set by this Court.

The Parties have recently and tentatively agreed to the broad terms of a
proposed settlement. One of the terms is that Motherless and two third party

1 witnesses (Rob Strassburg and Sean Hickey) appear for their depositions so that
2 Plaintiff may confirm, before finalizing the settlement, certain information provided
3 by Lange at his deposition. These three depositions have been scheduled to take
4 place on August 8 and 9, 2012, in New York, New York.

5 If these three depositions lead to a settlement, the Parties anticipate that the
6 final terms of the settlement can be agreed upon and documented in August 2012
7 without any further legal proceedings. If these depositions do not lead to a
8 settlement, the Parties anticipate that they will continue to conduct discovery and
9 otherwise prepare for trial.

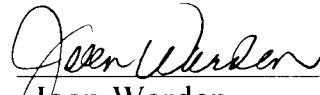
10 Based on the above, Defendants request that this Court set a status conference
11 in early September 2012, at which time the Parties can confirm that a settlement (if
12 not finalized and documented before the conference) is imminent or this Court can
13 set a trial date with attendant pretrial dates.

14
15 DATED: August 6, 2012 THEODORA ORINGHER PC

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17 By: /s/ - David S. Richman
18 David S. Richman
19 Attorneys for Defendants Motherless, Inc., and
20 Joshua Lange
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PROOF OF SERVICE

I certify that on the 6th day of August, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel who have provided email addresses.


Joan Warden

THEODORA TO ORINGER
ATTORNEYS AT LAW